

~~CONFIDENTIAL~~

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. CR 08- 100 - JO

v.

MARK ALLYN HOFFMAN,

INDICTMENT

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2253

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

(Sexual Exploitation of Children)

Beginning about January 2006, and continuing to on or about February 11, 2008, in the Districts of Oregon and Washington, **MARK ALLYN HOFFMAN**, the defendant herein, knowingly employed, used, persuaded, induced, enticed, or coerced *TH*, a minor, to engage in sexually explicit conduct, namely the lascivious exhibition of the genitals and pubic area of said minor, for the purpose of producing visual depictions of such conduct, while knowingly or having reason to know that said visual depictions would be transported in interstate or foreign commerce, said visual depictions having been produced using materials that were mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer, and said visual depictions having actually been transported in interstate or foreign commerce; all in violation of Title 18 United States Code, Sections 2251(a) and (e).

COUNT 2

(Possession of Child Pornography)

On or about November 6, 2007, in the District of Oregon, **MARK ALLYN HOFFMAN**, the defendant herein, knowingly possessed images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which contained visual depictions of actual minors engaged in sexually explicit conduct, such images having been transported in interstate and foreign commerce by any means, including computer; all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

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FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in this indictment, defendant, **MARK ALLYN HOFFMAN**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof, and any and all property used or intended to be used in any manner or part to commit or to promote the commission of the aforementioned violations, including without limitation the following:

1. Kodak EZ Share CX7220 Zoom Camera
2. Vivitar Vivicam 3765 Camera
3. Gateway Computer


Dated this 27 day of February 2008.

A TRUE BILL

~~OFFICIATING FOREPERSON~~

Presented by:

KARIN J. IMMERGUT
United States Attorney



KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney